

UNITED STATES DISTRICT COURT)
FOR THE DISTRICT OF COLUMBIA)
UNITED STATES OF AMERICA,)

vs.)

CHARLES EDWARD LITTLEJOHN,)
Defendant.)

Case: 1:23-cr-00343
Assigned To: Reyes, Ana C.
Assign. Date: 9/29/2023
Description: INFORMATION (A)



161440

The United States charges:

INFORMATION

GENERAL ALLEGATIONS

1. From in or about 2017 until in or about 2021, Defendant CHARLES EDWARD LITTLEJOHN served as a contractor to Company A, a consulting firm that serviced public and private clients.

2. During the relevant period, Defendant primarily worked on contracts Company A had obtained with the U.S. Department of the Treasury's Internal Revenue Service ("IRS"). Pursuant to 26 U.S.C. § 6103(n), returns and return information were disclosed to Defendant for purposes of tax administration.

3. From in or about 2018 until in or about 2020, while Defendant was working on an IRS contract, he stole tax returns and return information associated with Public Official A and thousands of the nation's wealthiest people, including returns and return information dating back more than 15 years. He thereafter disclosed the tax information associated with Public Official A to News Organization 1 and the other tax information to News Organization 2. Both news organizations published numerous articles describing the tax information they obtained from the Defendant.

COUNT ONE

(Disclosure of Tax Return and Return Information-26 U.S.C. § 7213(a)(1))

4. The General Allegations of this Information are re-alleged and fully incorporated here by reference.

5. From in or about August 2019 until in or about November 2020, in the Northern District of West Virginia and elsewhere, Defendant,

CHARLES EDWARD LITTLEJOHN,

a person described in 26 U.S.C. § 6103(n), did willfully disclose to any person, without authorization, any return or return information, as defined in 26 U.S.C. § 6103(b), to wit, the tax returns and return information of Public Official A and thousands of other persons.

(In violation of Title 26, United States Code, Section 7213(a)(1))

TAX FORFEITURE ALLEGATION
(28 U.S.C. § 2461(c); 26 U.S.C. § 7302)

6. Paragraphs 1 through 5 of this Information are re-alleged and fully incorporated here by reference.

7. Pursuant to Title 28, United States Code, Section 2461(c) and Title 26, United States Code, Section 7302, the United States gives notice to Defendant **CHARLES EDWARD LITTLEJOHN**, that in the event of his conviction for the offense charged in this Information, all property he has used in violating the provisions of the internal revenue laws is subject to forfeiture.

Respectfully submitted,

/s/ *Corey R. Amundson*

COREY R. AMUNDSON

Chief, Public Integrity Section
Criminal Division
U.S. Department of Justice
Lauren Castaldi
Jonathan E. Jacobson
Trial Attorneys
Public Integrity Section
United States Department of Justice
1301 New York Ave. NW
Washington, DC 20530
Telephone: (202) 514-1412